

Advocates for Workplace Fairness

September 26, 2023

Plaintiff's request for an extension is GRANTED. The briefing schedule for the enforcement motion is revised as follows: (1) Plaintiff is to serve, not file, her moving papers on or before Oct. 13, 2023; (2) Defendant is to serve, not file, their opposition on or before Nov. 13, 2023; and (3) Plaintiff is to serve her reply and all parties will file their papers on Dec. 4, 2023. The Clerk of Court is respectfully directed to terminate the motion at ECF No. 72.

Dated September 27, 2023 White Plains, NY

Via ECF:

The Honorable Nelson S. Roman United States District Judge Southern District of New York 300 Quarrapas St. White Plains, New York 10601-4150

Re: Dail Moses-Taylor v. Greyston Foundation, Inc., Case No. 21-cv-06756 (NSR)

Dear Judge Roman:

We represent the Plaintiff Dail Moses-Taylor in the above-referenced matter. We write with Defendant's consent to seek an extension of the current briefing schedule for Plaintiff's enforcement motion. *See* ECF No. 68. This is Plaintiff's first request for an extension. Earlier today, Defendant's counsel represented that the Settlement Payment at issue with be in transit to Plaintiff's counsel's office no later than this Friday, September 30, 2023. To allow time for the potential resolution of the primary issue pending before the Court, Plaintiff respectfully proposes the following extended briefing schedule:

October 13: Plaintiff to serve her enforcement motion

November 13: Defendant to serve its opposition

December 4: Plaintiff to serve her reply and file the fully-briefed motion on ECF

We thank the Court for its consideration of this matter.

USDC SDNY DOCUMENT

ELECTRONICALLY FILED

DOC #:

DATE FILED: 9/27/2023

Respectfully submitted,

Allison L. Van Kampen Outten & Golden LLP 685 Third Avenue, 25th Floor New York, NY 10017

Counsel for the Plaintiff

cc: All Parties (via ECF)